

1 PHILLIP A. TALBERT  
United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5 Attorneys for the United States

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$282,500.00 IN  
U.S. CURRENCY,

15 Defendant.  
16

2:24-MC-00317-DJC-CKD

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Ronnie  
19 Borrego (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture  
21 proceeding with the Drug Enforcement Administration with respect to the above-referenced currency  
22 (hereafter “defendant currency”), which was seized on or about February 9, 2024.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
26 than claimant has filed a claim to the defendant currency as required by law in the administrative  
27 forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
4 parties. That deadline is August 13, 2024.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
6 October 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
7 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
8 subject to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be  
10 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
11 alleging that the defendant currency is subject to forfeiture shall be extended to October 11, 2024.

12 Dated: 8/9/2024

PHILLIP A. TALBERT  
United States Attorney

13  
14 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

15  
16 Dated: 8/9/2024

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Ronnie Borrego  
(Authorized by email)

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18  
19  
20 **IT IS SO ORDERED.**

21  
22  
23 Dated: August 12, 2024

/s/ Daniel J. Calabretta  
THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE